

**Exhibit A**

**Proposed Order**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth and HTA.**

ORDER GRANTING THREE HUNDRED ELEVENTH OMNIBUS OBJECTION (NON-  
SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO  
RICO HIGHWAYS AND TRANSPORTATION AUTHORITY TO DEFICIENT BOND  
CLAIMS

Upon the *Three Hundred Eleventh Omnibus Objection (Non-Substantive) of the  
Commonwealth of Puerto Rico and the Puerto Rico Highways and Transportation Authority to  
Deficient Bond Claims* [ECF No. 16029] (the “Three Hundred Eleventh Omnibus Objection”),<sup>2</sup>  
filed by the Commonwealth of Puerto Rico (“Commonwealth”) and the Puerto Rico Highways

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Three Hundred Eleventh Omnibus Objection.

and Transportation Authority (“HTA,” and together with the Commonwealth, the “Debtors”), dated March 12, 2021, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth or HTA, as more fully set forth in the Three Hundred Eleventh Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Three Hundred Eleventh Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Three Hundred Eleventh Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims identified in Exhibit A to the Three Hundred Eleventh Omnibus Objection (collectively, the “Deficient Bond Claims”) having been found to be deficient; and the Court having determined that the relief sought in the Three Hundred Eleventh Omnibus Objection is in the best interests of the Commonwealth, HTA, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Three Hundred Eleventh Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Three Hundred Eleventh Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Three Hundred Eleventh Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Deficient Bond Claims are hereby disallowed in their entirety; and it is further

ORDERED that Prime Clerk, LLC, is authorized and directed to designate as expunged the Deficient Bond Claims on the official claims registry in the Title III Cases; and it is further

ORDERED that this Order resolves Docket Entry No. 16029 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Three Hundred Eleventh Omnibus Objection**

Three Hundred and Eleventh Omnibus Objection  
Exhibit A - Deficient Bondholder Claims

	NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT
1	PANAGOPOULOS, PAVLOS PO BOX 1279 BELEN, NM 87002-1279	3/16/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	2111	\$ 10,000.00
Reason: Proof of claim purports to assert liabilities associated with "bonds" issued by the Puerto Rico Highways and Transportation Authority, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors.						
2	PASTOR, CARMEN G., AS UNIVERSAL HEIR OF DAVID PASTOR-PEREZ EMILIO E. SOLE-DE LA PAZ ESQ., RAFAEL G. MARTINEZ-GEIGEL, ESQ. 13031 SOUTHWEST 119 STREET MIAMI, FL 33186-4507	5/25/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	30383	Undetermined*
Reason: Proof of claim purports to assert liabilities associated with "securities" issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for identifying the interests purportedly held or asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors						
3	QUILICHINI ORTIZ, NICOLE PO BOX 9020895 SAN JUAN, PR 00902-0895	5/29/2018	17 BK 03283-LTS	Commonwealth of Puerto Rico	28603	\$ 5,000.00
Reason: Proof of claim purports to assert liabilities associated with an "IRA" issued by the Commonwealth of Puerto Rico, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors						
4	SABATINI, PAUL 1500 WASHINGTON ST APT7J HOBOKEN, NJ 07030	3/21/2018	17 BK 03567-LTS	Puerto Rico Highways and Transportation Authority	1829	\$ 15,000.00
Reason: Proof of claim purports to assert liabilities associated with municipal bond(s) issued by the Puerto Rico Highways and Transportation Authority, but fails to provide any basis or supporting documentation for asserting a claim against the Commonwealth of Puerto Rico, HTA, and/or ERS, such that the Debtors are unable to determine whether claimant has a valid claim against the Commonwealth of Puerto Rico or any of the other Title III debtors						
TOTAL						\$ 30,000.00*